

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

In re:

GITTO GLOBAL CORPORATION,
DEBTOR.

CHAPTER 11
Case No. 04-45386 JBR

GARY GITTO,

Appellant,

APPEAL
No. 05-cv-10334 DPW

V.

WORCESTER TELEGRAM & GAZETTE
CORP., MEDIANEWS GROUP, INC.,
CHARLES L. GLERUM, EXAMINER,
and PHOEBE MORSE, UNITED STATES
TRUSTEE

Appellees.

**MOTION TO FILE CORRECTED BRIEF OF APPELLEE
WORCESTER TELEGRAM AND GAZETTE CORPORATION**

Appellee Worcester Telegram & Gazette Corporation hereby moves to file a Corrected Brief in order to correct items in the Brief's Table of Authorities and to correct certain non-substantive typographical errors. The proposed edits to the text of the brief are set forth in the Errata Sheet attached hereto as Exhibit A.

Counsel apologizes for any inconvenience caused by this request, but believes that the Corrected Brief will facilitate review by the Court and by the parties hereto. No additional arguments or case law have been added to the Corrected Brief.

WHEREFORE, Appellee Worcester Telegram & Gazette Corporation respectfully moves for leave to file the Corrected Brief submitted herewith.

**WORCESTER TELEGRAM &
GAZETTE CORPORATION,**

By its attorneys,

/s/ Aaron M. Wais

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Dated: March 10, 2005

CERTIFICATE OF SERVICE

I, Aaron M. Wais, do hereby certify that on this 10th day of March, 2005, I caused copies of the foregoing **MOTION TO FILE CORRECTED BRIEF OF APPELLEE WORCESTER TELEGRAM & GAZETTE CORPORATION** to be served electronically and via overnight mail on the foregoing parties:

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EXHIBIT A

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Appellees.

ERRATA SHEET FOR CORRECTED BRIEF OF APPELLEE
WORCESTER TELEGRAM AND GAZETTE CORPORATION

Please note the following changes that have been made to the Corrected Brief of Appellee
Worcester Telegram & Gazette Corporation:

1. Page 3, footnote 2, last line: the text “or sought leave to file their brief on March 6, 2005” was deleted.
2. Page 8, line 11: the citation was changed to “11 U.S.C. § 107(b)(1) & (2)”.
3. Page 10, § C, line 13: the word “be” was added.
4. Page 14, line 8: the word “court” was added and the word “an” was deleted.
5. Page 17, last line: the text “(Bankr. D. Mass. 1985)” was deleted.

6. Page 18, the citation for the blocked text was changed to “A.A. 94”.
7. Page 20, line 22: the citation was changed to “Mu’Min v. Virginia, 500 U.S. 415, 431-32 (1991)”.
8. Page 21, line 19: the citation was changed to “Richmond Newspapers, Inc. v. Virginia, 448 U.S. 555, 596 (1980) (Brennan, J., concurring)”.
9. Page 22, § F, line 5: the citation was changed to “Richmond Newspapers, 448 U.S. at 589 (Brennan, J., concurring)”.
10. Page 24, line 2: the citation was changed to “See Nixon, 453 U.S. at 597”.
11. Page 24, line 15: the citation was changed to “Standard Financial Management, 830 F.2d at 410”.
12. Page 24, line 21, the citation was changed to “Amodeo II, 71 F.3d at 1048”.
13. Page 24, footnote 14: the citations were changed to “Standard Financial Management, 830 F.2d at 408,” and “Bank of America National Trust and Savings Ass’n v. Hotel Rittenhouse Assoc., 800 F.2d 339, 343 (3d Cir. 1986)”.
14. Page 25, line 16: the citation was changed to “Globe Newspaper, 457 U.S. at 605 n. 13”.
15. Page 26, first line: the citation was changed to “Globe Newspaper, 457 U.S. at 607 n. 19, 610”.

/s/ Aaron M. Wais

Aaron M. Wais